

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA

v.

SHAUN W. BRIDGES

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CRIMINAL No.: 3:15-cr-00319-RS

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**DEFENDANT BRIDGES' MOTION
FOR EARLY SELF-SURRENDER TO FCI BERLIN**

Comes Now Shaun W. Bridges, by and through his counsel, Steven H. Levin, and respectfully requests this Honorable Court enter an order directing that Mr. Bridges be permitted to self-surrender on Thursday, January 28, 2016. As grounds in support thereof, undersigned counsel states as follows:

- 1) The Bureau of Prisons has designated Mr. Bridges to the minimum-security camp at FCI Berlin, New Hampshire;
- 2) Mr. Bridges' reporting date to FCI Berlin is Friday, January 29, 2016, at 12:00pm;
- 3) FCI Berlin, New Hampshire, is located approximately 10 hours from Mr. Bridges' current residence in Maryland by car;
- 4) As a practical matter, Mr. Bridges cannot depart Maryland on January 29, 2016, and arrive at FCI Berlin by noon on that same day, given the distance and forecast of snow;
- 5) Any suggestion that Mr. Bridges depart after midnight on January 29, 2016, thus placing his life and those of any family members accompanying him in jeopardy, would be contrary to the interests of justice;
- 6) Mr. Bridges' probation officer in the District of Maryland has advised that the Bureau of

Prisons would turn Mr. Bridges away were he to self-surrender a day early absent a court order.

CONCLUSION

For the reasons stated above, Mr. Bridges respectfully requests this Court grant his motion for early self-surrender on Thursday, January 28, 2016.

Respectfully submitted,

_____/s/_____
Steven H. Levin (Fed Bar #28750)
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Pro Hac Vice

It is so ORDERED, this ____ day of January, 2016

Judge Richard G. Seeborg
United States District Judge
Northern District of California